IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF OKLAHOMA

IN RE:

RICHARD ALVIN MANSFIELD
FDBA POOL AND DARTS
FDBA SOONER CORRAL
FDBA COWBOYS VAQUERO BRONCOS
FDBA RICHARD'S HOUSE OF DARTS,

DEBTOR

Case No.: BK-16-14038-JDL
Chapter 13

OBJECTION TO CHAPTER 13 PLAN OF DEBTOR

Comes now the secured creditor, Nationstar Mortgage, LLC, by their attorneys, Baer & Timberlake, P.C., and hereby objects to the Chapter 13 Plan of Debtor. In support of this Objection, Nationstar Mortgage, LLC would show the Court as follows:

1. Nationstar Mortgage, LLC is the holder of a purchase money note and mortgage on the principal residence, ("mortgaged property") of Debtor. Said note and mortgage has an estimated balance of $16,712.00 plus accruing interest along with reasonable attorney fees and for all costs of the action.

2. The proposed Chapter 13 Plan of the Debtor reflects an arrearage amount of $0.00. Nationstar Mortgage, LLC disputes this amount and would propose that the estimated arrearage amount is $11,805.78.

3. Further, the proposed Chapter 13 Plan of the Debtor reflects a secured claim of $14,000.00 and seeks a "cram down" of the mortgage by seeking to value the mortgaged property according to 11 U.S.C. §506 in contravention of the provisions of 11 U.S.C. §1322(b)(2), which prohibits modifying the rights of holders of secured claims in debtor's principal residence.

WHEREFORE, PREMISES CONSIDERED, secured creditor, Nationstar Mortgage, LLC, moves the Court to reject the proposed Chapter 13 Plan of Debtor and/or to grant adequate protection or such other and further relief as may be entitled.

NATIONSTAR MORTGAGE, LLC,

By: s/ Matthew J. Hudspeth______________

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Attorney for Movant

CERTIFICATE OF SERVICE

I hereby certify that I mailed a true and correct copy of the above and foregoing Objection with postage thereon fully prepaid to the parties listed below on November 4, 2016.

Richard Alvin Mansfield
6000 South Kelly
Oklahoma City, OK 73149

The following persons should have received notice of the above and foregoing instrument on the same day it was filed by the Court's CM/ECF Electronic Noticing System.

John T. Hardeman
P.O. Box 1948
Oklahoma City, OK 73101

Anna L. Self
8100 South Pennsylvania Ave
Ste B
Oklahoma City, OK 73159

By: s/ Matthew J. Hudspeth________________

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